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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte Presentation

Marlene **H.** Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Application by SBC Communications Inc., et al. for Provision of In-Region, InterLATA Services in Michigan*, WC Docket No. 03-16

Dear Ms. Dortch:

On behalf of SBC Communications Inc. ("SBC") and at the request of FCC staff, I am attaching the following documents: Attachment A contains copies of the "Replication Production and Documentation Content Status Summaries" prepared by BearingPoint and provided to the Michigan Public Service Commission on January 23, 2003, and February 27, 2003. Attachment B is a Supplemental Statement of John J. Muhs, explaining SBC's performance in September 2002 for PMs 73-05, 75-04, and 78-04 relating to the installation of interconnection **trunks.**

The material provided in Attachment A is confidential. Accordingly, pursuant to the Commission's rules governing the handling of such information, I **am** tiling one copy of this letter with the confidential material attached. Inquiries regarding access to the confidential material should be addressed to Kevin Walker, Kellogg, Huber, Hansen, Todd & Evans, PLLC, 1615 M Street, N.W., Suite 400, Washington, D.C., 20036, (202) 367-7820.

In accordance with this Commission's Public Notice, DA 03-156 **(Jan.** 16, 2003), SBC is filing the original and two copies of the redacted version of this letter and attachments. Thank you for your kind assistance in this matter. 0+2

REDACTED – FOR PUBLIC INSPECTION

Sincerely,

Geoffrey M. Klineberg

Attachments

cc: John P. Stanley
Gina Spade
Susan Pie
Layla Seirafi-Najar
Dorothy Wideman
Ann R. Schneidewind
Qualex International (Redacted version only)

Attachment A

Redacted for Public Inspection

Attachment B

Supplemental Statement **of** John **J.** Muhs

In my initial affidavit, I provided a discussion regarding the average installation interval associated with interconnection trunks. See Muhs Aff. ¶ 22 (App. A, Tab 18). In August 2002, SBC Midwest instituted a process improvement to ensure that installations of both "project" and "non-project" orders were handled in a timely manner. Installation of interconnection trunks requires both the establishment of a transmission path and translations work. SBC Midwest establishes the transmission path and coordinates with the CLEC prior to completing the translations. In some instances, SBC Midwest completed the transmission path and had deferred the translation work until both SBC Midwest and the CLEC agreed to schedule the translation work. As part of the process improvement, SBC Midwest proactively contacted CLECs on orders with past due dates that continued to have pending translation work. For August and September, this resulted in completion dates that, in some instances, were significantly beyond the benchmark standards associated with the pertinent performance metrics. This additional effort and the consequent work contributed to the September 2002 results for PM 73-05 (Percentage Missed Due Dates), PM 75-04 (Percentage of Amentech-Caused Missed Due Dates > 30 Days) and PM 78-04 (Average Interconnection Trunk Installation Interval).

In August 2002, SBC Midwest reinforced with its work force the need to regularly follow up with CLECs to assure that translations are being done in a timely fashion and that orders are appropriately coded to identify company-caused **vs.** customer-caused missed due dates. The subsequent clean **up** of orders caused the performance spikes in September. Michigan Bell met the benchmark standard for both PM 73-05 and PM 75-04 in each of the four months thereafter (October 2002 through January 2003). Performance for PM 78-04 met the 20-day benchmark in October (14.17 days), fell just short in November (21.98 days) and met the benchmark in both December and January (17.01 days and 19.16 days, respectively). Additionally, had orders denominated as "projects" been removed from the results for September, the average installation interval for September would have been approximately 14.3 days. (As 1noted in my initial affidavit (¶ 22), during the most recent **six** month review collaborative, the parties agreed that data for "projects" and "non-projects" should be reported as separate disaggregations, with the disaggregation for "projects" regarded as diagnostic.). It should further be noted that not having completed the above-referenced translations work did not result in abnormal blockage on other trunks